Louisiana Department of Environmental Quality
Office of Environmental Services

STATEMENT OF BASIS
For
Activity Number: PER20060001
Permit No. 2560-00041-V1

St. James – Capline Terminal
Agency Interest No. 9292
Shell Pipeline Company LP
St. James, St. James Parish, Louisiana

I. APPLICANT

Company

Shell Pipeline Company LP
Post Office Box 2648
Houston, Texas 77252-2648

Facility

St. James – Capline Terminal
6770 Highway 18, St. James, St. James Parish, Louisiana
UTM Coordinates: 275.55 kilometers East and 3216.06 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

Crude oil from pipelines, tankers, and barged is received and temporarily stored in external floating roof tanks at the St. James - Capline Terminal. Crude oil is then transported off-site by pipelines. Crude oil throughput at the terminal is limited by two federally enforceable conditions (caps). Emissions are from storage tanks, generators, sumps, and fugitives.

The St. James – Capline Terminal currently operates under Permit 2560-00041-V0, dated April 29, 2002.

III. PROPOSED PERMIT / PROJECT INFORMATION

Proposed Permit

A Part 70 operating permit application and Emission Inventory Questionnaire dated October 5, 2006 were submitted requesting a Part 70 operating permit renewal.

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, and in the local newspaper. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List. The application and proposed permit were submitted to the St. James Parish Library. The proposed permit was submitted to US EPA Region VI. All comments will be considered prior to the final permit decision.

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Project description

Shell Pipeline Company requested a Part 70 operating permit renewal for the terminal. The gasoline tank is removed while operating times of two generators are increased. Emissions from the terminal were recalculated based on updated emissions factors and actual operating conditions.

Permitted Air Emissions

Permitted emissions from the terminal in tons per year are as follows:

Pollutant	Permitted	Proposed	Change
PM_{10}	0.02	0.31	+ 0.29
SO_2	0.02	0.28	+ 0.26
NO_X	0.44	5.60	+ 5.16
CO	0.18	3.20	+ 3.02
VOC, total	119.98	137.41	+ 17.43

Prevention of Significant Deterioration (PSD) Applicability

Emissions of the criteria pollutants from the terminal are less than the PSD major source threshold of 250 tons/year. Therefore, PSD analysis was not required.

Maximum Achievable Control Technology (MACT) requirements

Emissions of Toxic Air Pollutants (TAPs) from the terminal are less than the major source threshold. MACT is not required.

Air Modeling Analysis

Emissions from these units are not expected to cause or to contribute to any National Ambient Air Quality Standards (NAAQS) or Ambient Air Standards (AAS) exceedances.

Dispersion Model Used: None

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

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Insignificant Activities (LAC 33:III.501.B.5)

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the proposed permit.

IV. PERMIT SHIELDS

The Permit does not include any Permit Shields

V. PERIODIC MONITORING

The Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the proposed permit. Federally enforceable conditions are used to limit the crude oil throughput of the terminal. Permittee will monitor monthly crude oil throughput and twelve consecutive month total throughput. The terminal crude oil throughput is reported annually.

VI. APLICABILITY AND EXEMPTIONS OF SELECTED SUBJECT ITEMS

ID No:	Requirement	Status	Citation	Explanation
EQT002, EQT003, EQT004 EQT012 – EQT017 EQT021, EQT022	NSPS Subpart K for storage tanks	Does not apply	40 CFR 60.110(c)(2)	No construction / modification after June 11, 1973
EQT028, EQT029	LAC 33:III.1503.C. Emission Standards for Sulfur Dioxide	Exempt	LAC 33:III.1503.C	SO_2 emissions < 250 tons/year
	LAC 33:III.1511 CEM for SO_2	Exempt	LAC 33:III.1511.A	SO_2 emissions < 100 tons/year
GRP001	LAC 33:III.Chapter 51	Does not apply	LAC 33:III.5101	The terminal is considered a minor source of TAPs

VII. STREAMLINED REQUIREMENTS

The Permit does not include any streamlined requirements.

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VIII. GLOSSARY

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring rule – A federal air regulation under 40 CFR Part 64

Carbon Black - A black colloidal substance consisting wholly or principally of amorphous carbon and used to make pigments and ink.

Carbon Monoxide (CO) – (Carbon monoxide) a colorless, odorless gas produced by incomplete combustion of any carbonaceous (gasoline, natural gas, coal, oil, etc.) material.
Cooling Tower – A cooling system used in industry to cool hot water (by partial evaporation) before reusing it as a coolant.

Continuous Emission Monitoring System (CEMS) – The total combined equipment and systems required to continuously determine air contaminants and diluent gas concentrations and/or mass emission rate of a source effluent.

Cyclone – A control device that uses centrifugal force to separate particulate matter from the carrier gas stream.

Duct Burner – A device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

Federally Enforceable Specific Condition - A federally enforceable specific condition written to limit the potential to Emit (PTE) of a source that is permanent, quantifiable, and practically enforceable. In order to meet these requirements, the draft permit containing the federally enforceable specific condition must be placed on public notice and include the following conditions:

- A clear statement of the operational limitation or condition which limits the source's potential to emit;
- Recordkeeping requirements related to the operational limitation or condition;
- A requirement that these records be made available for inspection by LDEQ personnel;
- A requirement to report for the previous calendar year.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Heat Recovery Steam Generator (HRSG) – A steam generator that recovers exhaust heat from a gas turbine, and provides economizing and steam generation surfaces.

Hydrogen Sulfide (H_2S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

NESHAP - National Emission Standards for Hazardous Air Pollutants –Air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

NSPS - New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥10 tons per year of any toxic air pollutant; ≥25 tons of total toxic air pollutants; and ≥100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10}- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.